

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Roland Olsen

(b) County of Residence of First Listed Plaintiff Montgomery County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Caren N. Gurmankin, Esq., Console Mattiacci Law,
1525 Locust Street, 9th Fl., Philadelphia, PA 19102, 215-545-7676

DEFENDANTSTrue Talent Advisory LLC
True Capital Partners LLC

County of Residence of First Listed Defendant Camden County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
29 U.S.C. §621, et seq.; N.J.S.A. 10:5-1, et seq.

Brief description of cause:

Plaintiff was discriminated against because of his age.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**
in excess of \$75,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

09/19/2024

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

ROLAND OLSEN
Collegeville, PA 19426

Plaintiff,

v.

TRUE TALENT ADVISORY LLC
56 N. Haddon Avenue, First Floor
Haddonfield, NJ 08033

and

TRUE CAPITAL PARTNERS LLC
56 N. Haddon Avenue, First Floor
Haddonfield, NJ 08033

Defendants.

CIVIL ACTION NO.

JURY TRIAL DEMANDED

COMPLAINT

I. INTRODUCTION

Plaintiff, Roland Olsen, brings this action against his former employers, True Talent Advisory, LLC and True Capital Partners LLC (“Defendants”). Defendants terminated Plaintiff’s employment when he was fifty-seven (57) years old and after about twenty-two (22) years of employment with Defendants and their predecessor company. Defendants’ discriminatory conduct violated the Age Discrimination in Employment Act, 29 U.S.C. §621, *et seq.* (“ADEA”) and the New Jersey Law Against Discrimination, as amended, N.J.S.A. 10:5-1, *et seq.* (“NJLAD”). Plaintiff seeks damages, including compensatory, liquidated and punitive damages and all other relief this Court deems appropriate.

II. PARTIES

1. Plaintiff, Roland Olsen, is an individual and a citizen of the Commonwealth of Pennsylvania. He resides in Collegeville, PA.

2. Plaintiff was fifty-seven (57) years of age at the time that Defendants terminated his employment.

3. Defendant, True Talent Advisory LLC, is a Delaware corporation with a principal place of business at 56 N. Haddon Avenue, First Floor, Haddonfield, NJ 08033.

4. Defendant, True Capital Partners LLC, is a New Jersey corporation with a principal place of business at 56 N. Haddon Avenue, First Floor, Haddonfield, NJ 08033.

5. Defendants are engaged in an industry affecting interstate commerce and regularly do business in the state of New Jersey.

6. At all times material hereto, Defendants employed more than twenty (20) employees.

7. At all times material hereto, Defendants acted by and through their authorized agents, servants, workmen, and/or employees acting within the course and scope of their employment with Defendants and in furtherance of Defendants' business.

8. At all times material hereto, Defendants acted as employers within the meanings of the statutes which form the basis of this matter.

9. At all times material hereto, Plaintiff was an employee of Defendants within the meanings of the statutes which form the basis of this matter.

10. Plaintiff was paid by Defendant True Capital Partners LLC.

III. JURISDICTION AND VENUE

11. The causes of action which form the basis of this matter arise under the ADEA and the NJLAD.

12. The District Court has jurisdiction over Count I (ADEA) pursuant to 29 U.S.C. §626(c) and 28 U.S.C. §1331.

13. The District Court has jurisdiction over all counts pursuant to 28 U.S.C. §1332 since the amount in controversy in the present action exceeds the sum or value of seventy five thousand dollars (\$75,000), exclusive of interests and costs, and there exists complete diversity of citizenship, as Plaintiff is a citizen of the Commonwealth of Pennsylvania, and Defendants are not citizens of the Commonwealth of Pennsylvania.

14. The District Court has supplemental jurisdiction over Count II (NJLAD) pursuant to 28 U.S.C. §1367.

15. Venue is proper in the District Court under 28 U.S.C. §1391(b).

16. On or about January 18, 2024, Plaintiff filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”), complaining of acts of discrimination alleged herein. Attached hereto, incorporated herein and marked as Exhibit “1” is a true and correct copy of the EEOC Charge of Discrimination (with minor redactions for purposes of electronic filing of confidential/identifying information).

17. On or about June 24, 2024, the EEOC issued to Plaintiff the Notice of Right to Sue. Attached hereto and marked as Exhibit “2” is a true and correct copy of the EEOC Notice of Right to Sue (with minor redactions for purposes of electronic filing of confidential/identifying information).

18. Plaintiff has fully complied with all administrative prerequisites for the

commencement of this action.

IV. FACTUAL ALLEGATIONS

19. Plaintiff was hired by Defendants' predecessor on or about August 30, 2001. He became an employee of Defendants in or about December 2021 when they acquired the predecessor company.

20. As of the time of his termination, Plaintiff reported directly to Andy Towne, Partner and Co-Head of Defendants' Climate Tech Practice.

21. Plaintiff consistently performed his job in a highly competent manner.

22. On or about September 23, 2023, Josh Withers, Founder and General Manager, Platform and North America Search Operations, informed Plaintiff that Defendants were laying him off.

23. When Plaintiff asked Withers why he had been selected for termination, Withers said that Plaintiff was one of the bottom performers based on a survey that Defendants had conducted.

24. Plaintiff asked Withers to see the survey results that Withers had referenced. Withers told Plaintiff that he did not know if he could share the survey results with Plaintiff, but that he would make a note of Plaintiff's request.

25. Withers told Plaintiff that he was a "bottom" performer.

26. Withers did not give Plaintiff details regarding his allegation that Plaintiff was a "bottom" performer.

27. When Plaintiff asked Withers whether there was any other reason for his termination other than the survey that Withers referenced, he said that there was not.

28. Prior to Defendants telling Plaintiff that he was being terminated, no one

had discussed with him concerns regarding his sales performance.

29. To Plaintiff's information and belief, his sales performance in 2022 and 2023 exceeded that of younger partners whom Defendants did not terminate.

30. To Plaintiff's information and belief, his accounts were reassigned to younger partners.

31. To Plaintiff's information and belief, around the time of his termination, a member of Defendants' management team encouraged an older partner to negotiate a severance package and leave his employment at Defendants.

32. To Plaintiff's information and belief, another older partner in his group was also terminated at the same time that Plaintiff was terminated.

33. Defendants failed to provide a legitimate, non-discriminatory reason for terminating Plaintiff's employment.

34. Plaintiff's age was a motivating and determinative factor in Defendants' discriminatory treatment of Plaintiff and in the termination of Plaintiff.

35. As a direct and proximate result of the discriminatory conduct of Defendants, Plaintiff has in the past incurred, and may in the future incur, a loss of earnings and/or earning capacity, loss of benefits, pain and suffering, embarrassment, humiliation, loss of self-esteem, mental anguish, and loss of life's pleasures, the full extent of which is not known at this time.

36. The conduct of Defendants, as set forth above, warrants the imposition of punitive damages against Defendants.

37. The conduct of Defendants was intentional and willful under the circumstances and warrants the imposition of liquidated damages against Defendants.

COUNT I - ADEA

38. Plaintiff incorporates herein by reference paragraphs 1 through 37 above, as if set forth herein in their entirety.

39. By committing the foregoing acts of discrimination against Plaintiff, Defendants have violated the ADEA.

40. Said violations were willful and warrant the imposition of liquidated damages.

41. As a direct and proximate result of Defendants' violation of the ADEA, Plaintiff has suffered the damages and losses set forth herein and has incurred attorney's fees and costs.

42. Plaintiff is now suffering and will continue to suffer irreparable injury and monetary damages as a result of Defendants' discriminatory acts unless and until this Court grants the relief requested herein.

43. No previous application has been made for the relief requested herein.

COUNT II - NJLAD

44. Plaintiff incorporates herein by reference paragraphs 1 to 43 above, as if set forth herein in their entirety.

45. Defendants, by the above-described discriminatory acts, have violated the NJLAD.

46. As a direct and proximate result of Defendants, Plaintiff has sustained the injuries, damages and losses set forth herein.

47. Members of upper management of Defendants had actual participation in, or willful indifference to, Defendants' wrongful conduct described herein.

48. Defendants' conduct warrants the imposition of punitive damages under the NJLAD.

49. Plaintiff is now suffering and will continue to suffer irreparable injury and monetary damages as a result of Defendants' discriminatory and unlawful acts unless and until this Court grants the relief requested herein.

RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendants:

(a) declaring the acts and practices complained of herein to be in violation of the ADEA;

(b) declaring the acts and practices complained of herein to be in violation of the NJLAD;

(c) enjoining and restraining permanently the violations alleged herein;

(d) awarding compensatory damages to Plaintiff to make Plaintiff whole for all past and future lost earnings, benefits and earnings capacity which Plaintiff has suffered and will continue to suffer as a result of Defendants' discriminatory and unlawful misconduct;

(e) awarding compensatory damages to Plaintiff for past and future emotional upset, mental anguish, humiliation, loss of life's pleasures and pain and suffering;

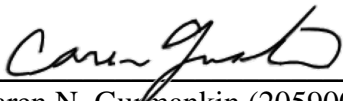
(f) awarding Plaintiff costs of this action, together with reasonable attorneys' fees;

- (g) awarding liquidated damages to Plaintiff under the ADEA;
- (h) awarding punitive damages to Plaintiff under the NJLAD;
- (i) awarding Plaintiff such other damages as are appropriate under the ADEA and the NJLAD; and,
- (j) granting such other and further relief as this Court deems appropriate.

CONSOLE MATTIACCI LAW LLC

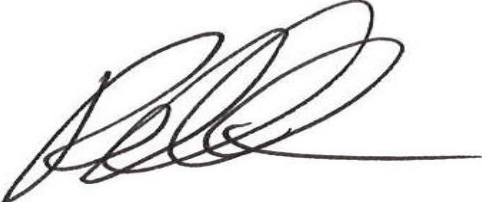
Dated: 09/19/24

BY:


Caren N. Guzmankin (205900)
110 Marter Avenue, Suite 105
Moorestown, NJ 08057
(856) 854-4000
(856) 854-4006

Attorney for Plaintiff,
Roland Olsen

Exhibit 1

CHARGE OF DISCRIMINATION		AGENCY <input type="radio"/> FEPA <input checked="" type="radio"/> EEOC	CHARGE NUMBER
This form is affected by the Privacy Act of 1974; See privacy statement before consolidating this form.			
STATE OR LOCAL AGENCY:			
NAME (Indicate Mr., Ms., Mrs.) Roland Olsen		HOME TELEPHONE NUMBER (Include Area Code) [REDACTED]	
STREET ADDRESS [REDACTED]		CITY, STATE AND ZIP Collegeville, PA 19426	DATE OF BIRTH [REDACTED]
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP, COMMITTEE, STATE OF LOCAL GOVERNMENT WHO DISCRIMINATED AGAINST ME (If more than one than list below)			
NAME True Talent Advisory, LLC; True Capital Partners LLC		NUMBER OF EMPLOYEES, MEMBERS > 20	TELEPHONE (Include Area Code) (646) 741-2585
STREET ADDRESS 56 N. Haddon Avenue, First Floor		CITY, STATE AND ZIP Haddonfield, NJ 08033	COUNTY Camden
CAUSE OF DISCRIMINATION (Check appropriate box(es)) <input type="radio"/> Race <input type="radio"/> Color <input type="radio"/> Sex <input type="radio"/> Religion <input type="radio"/> National Origin <input type="radio"/> Retaliation <input checked="" type="radio"/> Age <input type="radio"/> Disability <input type="radio"/> Other (Specify) Pregnancy		DATE DISCRIMINATION TOOK PLACE Earliest _____ Latest 09/26/2023	
<u>The Particulars Are:</u>			
A. 1. Relevant Work History			
<p>I was hired by Respondents' predecessor, Hobbs & Towne, Inc., on or about August 30, 2001. I became an employee of Respondents when they acquired the predecessor company in or about December 2021. I last reported to Andy Towne, Partner and Co-Head of the Climate Tech Practice.</p> <p>Since my start date with Respondents' predecessors, I have worked in the Climate Technology group. I consistently demonstrated positive performance and dedication to Respondents. I performed my duties in a competent manner.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures		NOTARY - (when necessary for State and Local Requirements) I swear of affirm that I have read the above charge and that it is true to the best of my knowledge information and belief.	
I declare under penalty of perjury that the foregoing is true and correct.			
Date: 1/17/2024 Charging Party (Signature): 		SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day Month, and year)	

**EEOC Charge of Discrimination
Initials of Charging Party –**

2. Harm Summary

I have been discriminated against because of my age. Evidence of the discriminatory conduct to which I have been subjected includes, but is not limited to, the following.

- (a) On or about September 26, 2023, Josh Withers, Founder and General Manager, Platform and North America Search Operations, informed me that I was being laid off;
- (b) When I asked Withers why I had been selected for termination, he told me that I was one of the bottom performers based on a survey that Respondents had conducted. When I asked to see the survey results, Withers told me that he did not know if he could share them, but that he would make a note of my request;
- (c) Withers also told me that I was a “bottom” performer. He did not give me any details regarding the same;
- (d) When I asked Withers whether there was any other reason for my termination other than the survey that he referenced, he said that there was not;
- (e) Prior to Respondents giving me notice of my termination, no one had discussed with me any concerns regarding my sales performance;
- (f) To my knowledge, my sales performance in 2022 and 2023, as of the time that I was given notice of my termination, exceeded many younger partners who, to my knowledge, were not terminated;
- (g) To my information and belief, my accounts have been transitioned to other, younger partners;
- (h) To my information and belief, another partner and I in the Climate Technology group, were among the oldest in my group and the only two in my group who were terminated;
- (i) To my information and belief, around the time of my termination, a member of the management team encouraged another older partner (in his late sixties) to negotiate a severance package and leave his employment at Respondents;

B. 1. Respondents’ Stated Reasons

Respondents’ explanation for terminating my employment is pretextual.

C. 1. Statutes and Bases for Allegations

I believe that Respondents have discriminated against me based on my age in violation of the Age Discrimination in Employment Act, as amended, 29 U.S.C. § 623 *et seq.* (“ADEA”) and the New Jersey Law Against Discrimination, as amended, N.J.S.A. § 10:5-1, *et seq.* (“NJLAD”), as set forth herein.

Exhibit 2



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Philadelphia District Office
801 Market St, Suite 1000
Philadelphia, PA 19107
(267) 589-9700
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 06/24/2024

To: Roland Olsen

██████████
Collegeville, PA 19426
Charge No: 530-2024-02774

EEOC Representative and phone:

Legal Unit Representative
267-589-9707

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 530-2024-02774.

On behalf of the Commission,

Digitally Signed By: Karen McDonough
06/24/2024

Karen McDonough
Deputy District Director